

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

QUICKVAULT, INC.,

Plaintiff,

v.

BROADCOM INC., d/b/a BROADCOM
CORPORATION

Defendant.

Case No.: 1:24-cv-00864

JURY TRIAL DEMANDED

EXHIBIT N

'029 Patent Infringement Claim Chart

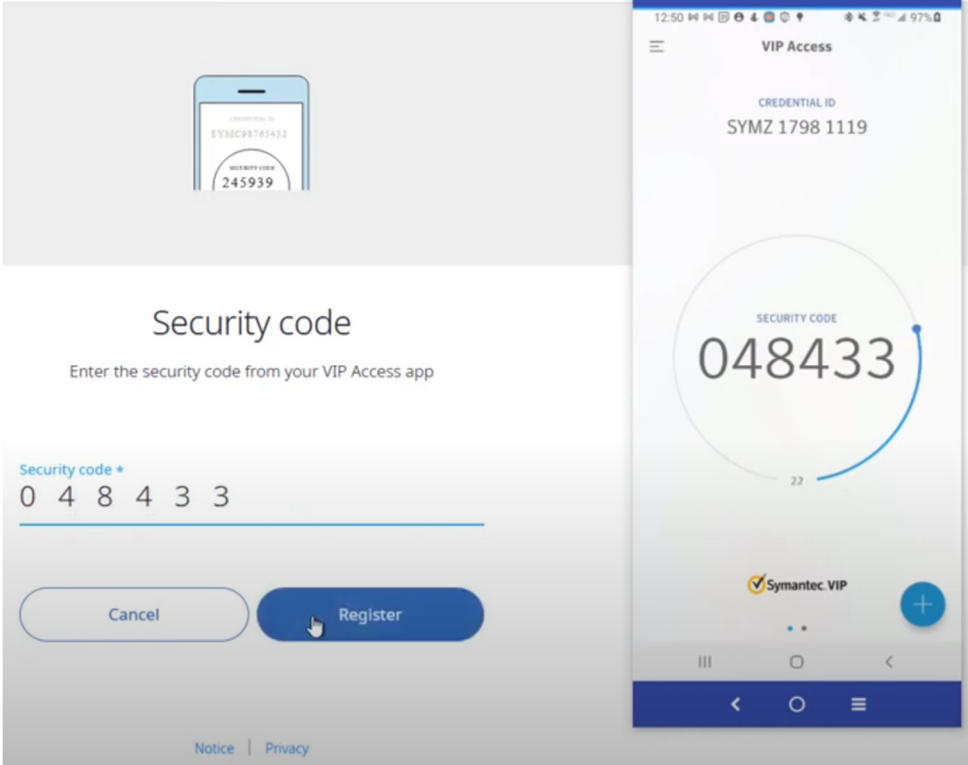
EXHIBIT N: U.S. PATENT NO. 11,568,029 INFRINGEMENT CLAIM CHART¹

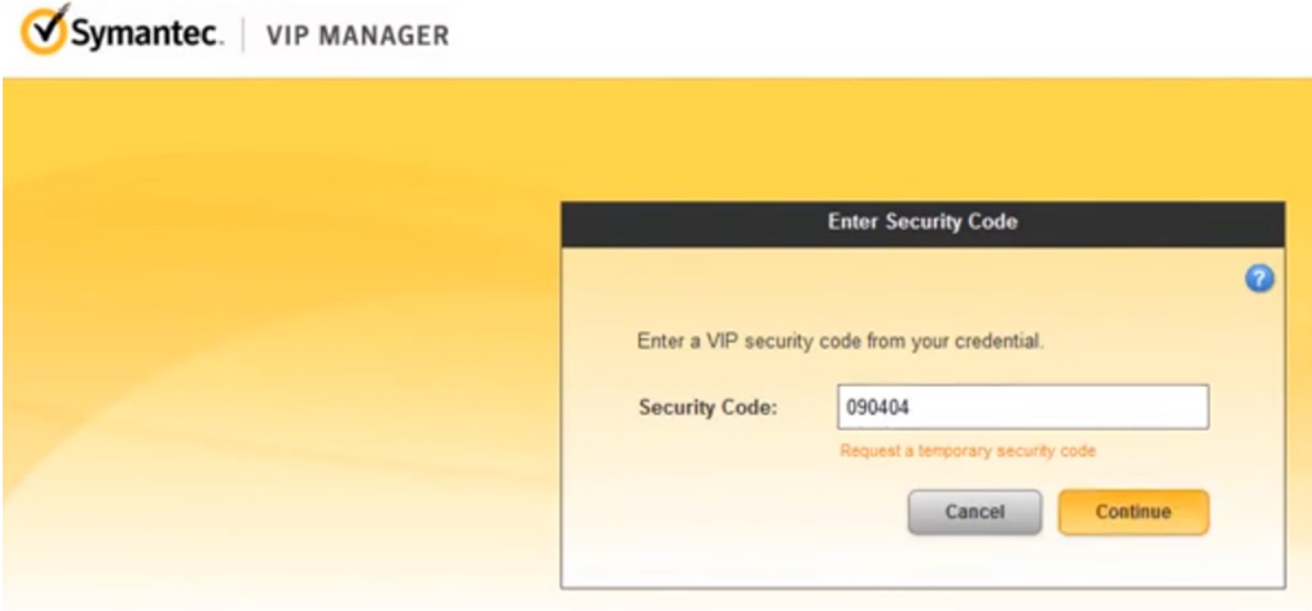
Claim 1	Broadcom Symantec VIP
<p>A computer-implemented method for remote data access using a user device, the computer-implemented method comprising:</p>	<p>The preamble is presumptively not limiting. To the extent the preamble is limiting, Symantec VIP performs a computer-implemented method for remote data access using a user device.</p> <div data-bbox="514 435 1894 885"> <p style="text-align: center;">Solution Overview</p> <p>Symantec® VIP is a multifactor, risk-based authentication service that provides a secure and user-friendly way to protect mobile and web applications anytime, anywhere, from any device for your employees, customers, and partners, enabling a critical piece of your Zero Trust security strategy. VIP's cloud-based infrastructure delivers scalability and reliability to enable your organization to support millions of users.</p> <p>Looking for an on-premise authentication solution? Symantec Advanced Authentication can authenticate employees, customers, or partners while providing a frictionless login experience. This ensures that legitimate users have anytime, anywhere access from any device, which builds trust and brand loyalty.</p> <p>Looking for something in between? Symantec VIP Authentication Hub boasts a cloud-native architecture, allowing for deployment within minutes that delivers primary and secondary authentication and policy orchestration to control the authentication journey.</p> </div> <p>(https://www.broadcom.com/products/identity/vip)</p>
<p>receiving, by a remote computer from the user device, an authentication request comprising a user device unique identifier, a software identifier, and a</p>	<p>Device Hygiene</p> <p>VIP includes a device hygiene SDK that can be used inside of a mobile application to evaluate the device for malware, jailbreaking, and network risk. The SDK also lets your client deny access to compromised devices before they can attempt authentication to your network, and track advanced and persistent threats.</p>

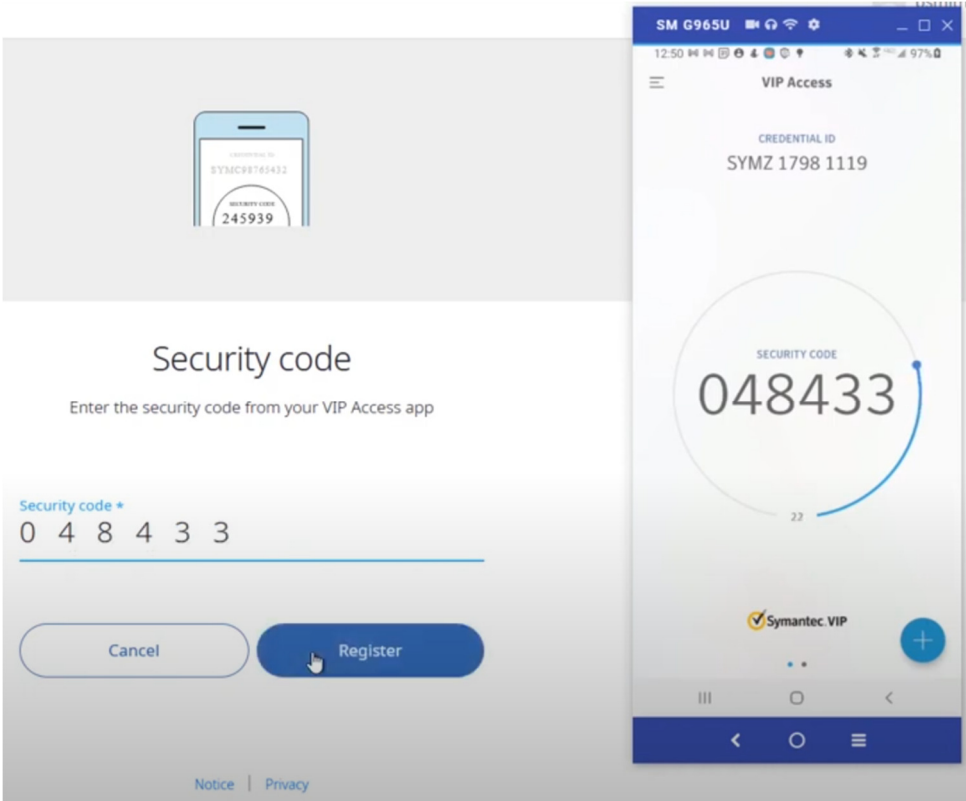
¹ The evidence of infringement identified in the below chart is exemplary and nonlimiting. QuickVault reserves the right to rely on additional and/or alternative aspects of Symantec VIP and related components during this litigation for the purpose of establishing infringement.

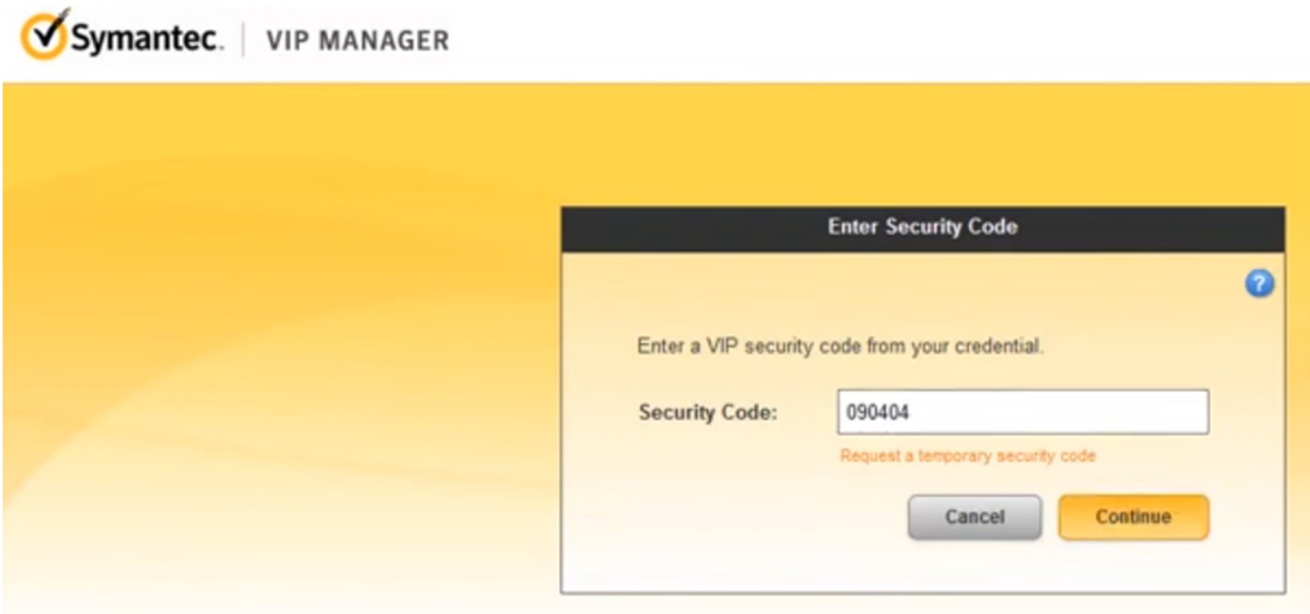
Claim 1	Broadcom Symantec VIP
mobile authentication device unique identifier,	<p data-bbox="520 264 989 302">Multifactor Authentication</p> <p data-bbox="520 318 1236 898">Being able to positively identify legitimate users from fraudulent ones is an important first step to achieving Zero Trust, and a critical step in designing a modern identity fabric. VIP enables enterprises to deliver secure access to corporate networks and applications from anywhere in the world, providing improved productivity and better insight. The service offers a multitude of user-friendly authentication options to protect against unauthorized access, including a broad range of second-factor options such as push, SMS or Voice OTP, mobile authenticators, FIDO2, and biometrics. VIP also offers a series of hardware-based authenticators, including cards, keys, and tokens that can be purchased separately. These options can be used for internal employees or partners. Finally, the cloud-based service is also built to protect consumer-facing mobile and web applications, resulting in increased customer confidence and reduced fraud costs.</p> <p data-bbox="520 927 1115 959">https://docs.broadcom.com/doc/symantec-vip</p>

Claim 1	Broadcom Symantec VIP
	<p>VIP Policy Configuration</p> <p>Account VIP Intelligent Authentication Components VIP Login Azure AD</p> <p>Enable VIP Intelligent Authentication:</p> <p>Sign-in threshold value:</p> <p>Always require security code from unrecognized devices:</p> <p>Countries with increased risk:</p> <p><u>Blocked IP addresses:</u></p> <p><u>Accepted IP addresses:</u></p> <p>(https://www.youtube.com/watch?v=SdY13B5mExI (5:47))</p>

Claim 1	Broadcom Symantec VIP
	 <p>(https://www.youtube.com/watch?v=SdY13B5mExI (1:33))</p>

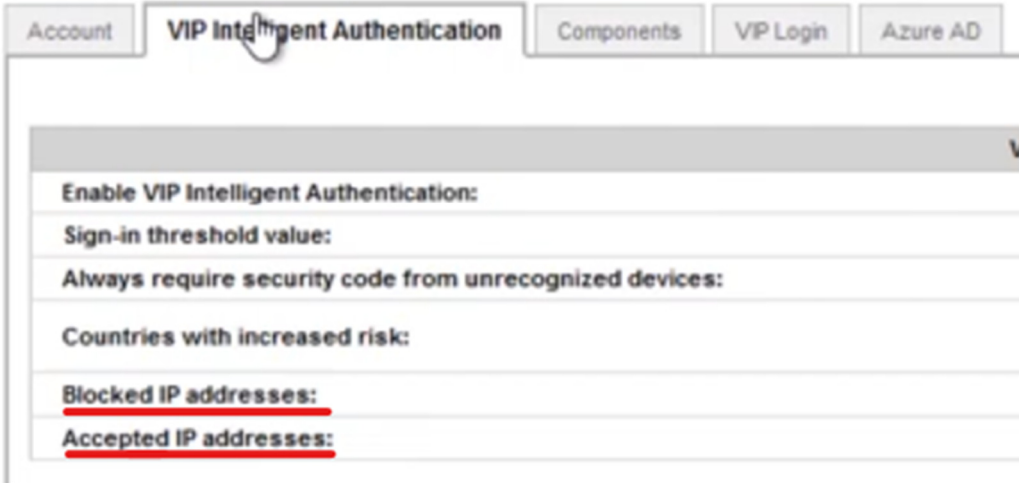
Claim 1	Broadcom Symantec VIP
	 <p>The screenshot shows the Symantec VIP Manager interface. At the top, the Symantec logo and 'VIP MANAGER' text are visible. Below this is a large yellow rectangular area. Overlaid on this area is a white dialog box titled 'Enter Security Code'. Inside the dialog, there is a prompt 'Enter a VIP security code from your credential.' followed by a text input field labeled 'Security Code:' containing the value '090404'. Below the input field is a link that says 'Request a temporary security code'. At the bottom of the dialog are two buttons: 'Cancel' and 'Continue'.</p> <p>(https://www.youtube.com/watch?v=SdY13B5mExI (3:30))</p>

Claim 1	Broadcom Symantec VIP
<p>wherein the mobile authentication device unique identifier is provided to the user device from a mobile authentication device,</p>	 <p>(https://www.youtube.com/watch?v=SdY13B5mExI (1:33))</p>

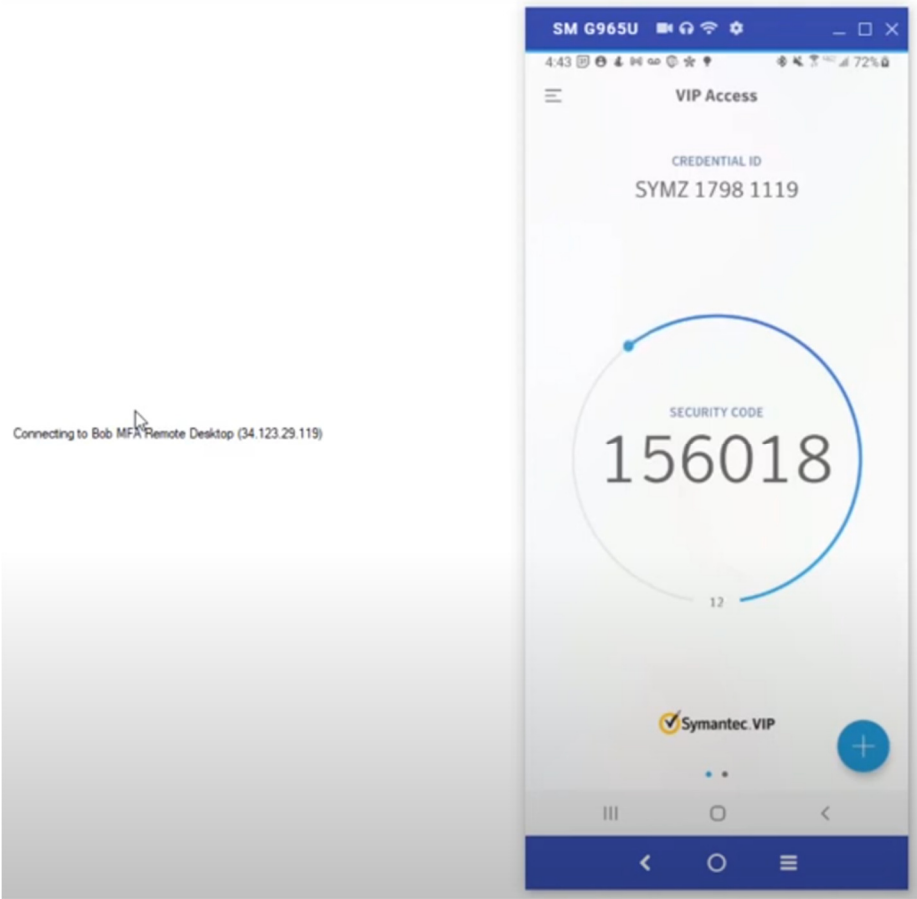
Claim 1	Broadcom Symantec VIP
	<div data-bbox="512 266 1814 876">The screenshot shows the Symantec VIP Manager interface. At the top left is the Symantec logo and the text "VIP MANAGER". The background is a yellow gradient. A modal dialog box titled "Enter Security Code" is centered on the screen. Inside the dialog, it says "Enter a VIP security code from your credential." Below this is a label "Security Code:" followed by a text input field containing the code "090404". Under the input field is a link that says "Request a temporary security code". At the bottom of the dialog are two buttons: "Cancel" and "Continue".</div> <p data-bbox="512 893 1281 933">https://www.youtube.com/watch?v=SdY13B5mExI (3:30))</p>

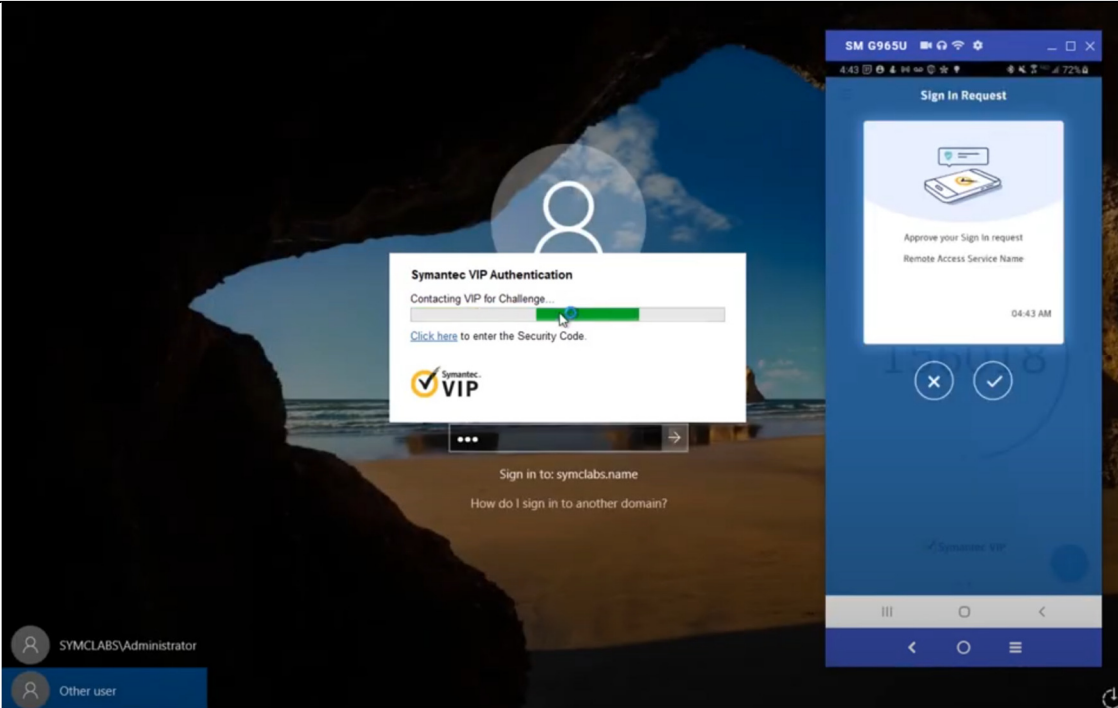
Claim 1	Broadcom Symantec VIP
<p>wherein the software identifier is associated with a software application stored on the user device,</p>	<p>Multifactor Authentication</p> <p>Being able to positively identify legitimate users from fraudulent ones is an important first step to achieving Zero Trust, and a critical step in designing a modern identity fabric. VIP enables enterprises to deliver secure access to corporate networks and applications from anywhere in the world, providing improved productivity and better insight. The service offers a multitude of user-friendly authentication options to protect against unauthorized access, including a broad range of second-factor options such as push, SMS or Voice OTP, mobile authenticators, FIDO2, and biometrics. VIP also offers a series of hardware-based authenticators, including cards, keys, and tokens that can be purchased separately. These options can be used for internal employees or partners. Finally, <u>the cloud-based service is also built to protect consumer-facing mobile and web applications</u>, resulting in increased customer confidence and reduced fraud costs.</p> <p>(https://docs.broadcom.com/doc/symantec-vip)</p>
<p>wherein the user device unique identifier and the software identifier are further associated with a software</p>	<p>The device unique identifier and the software identifier are associated with a software license to at least Symantec VIP stored on the remote computer.</p>

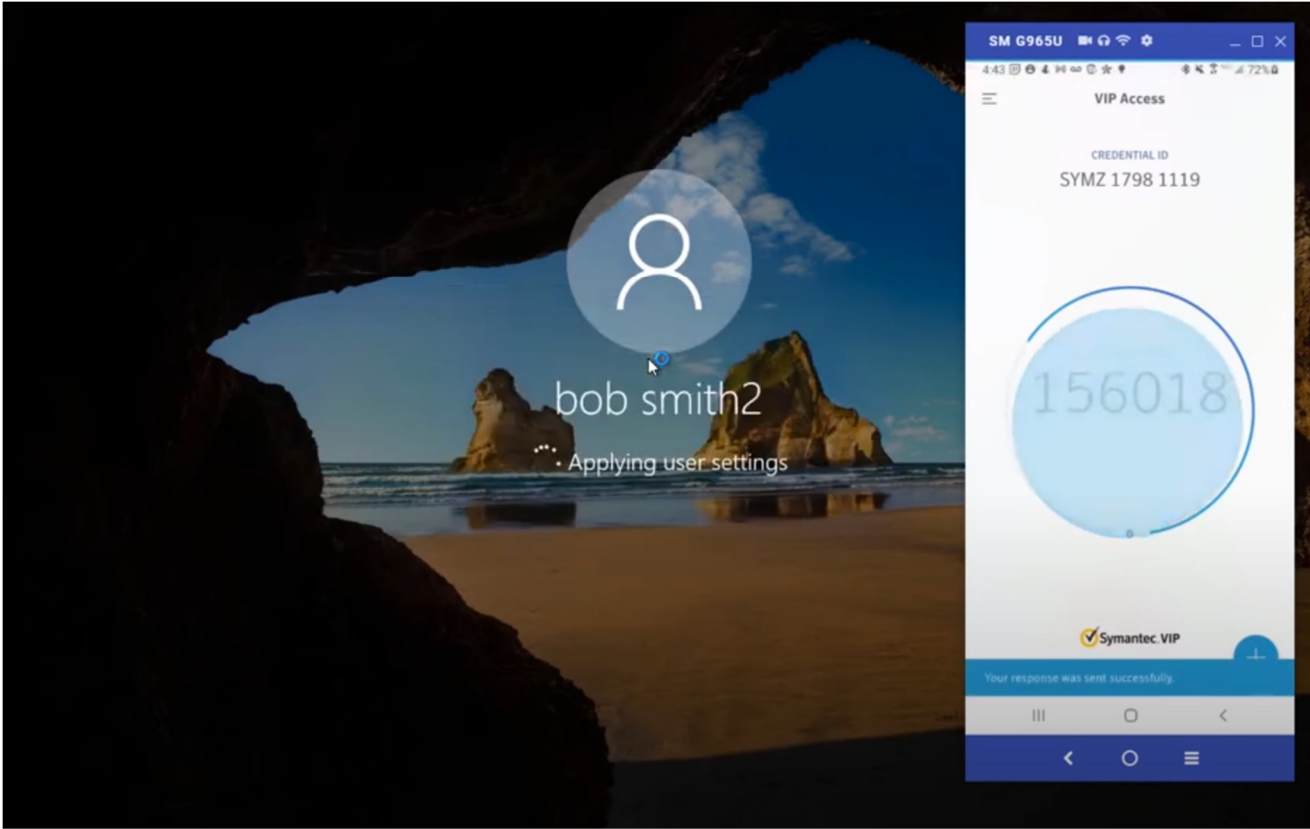
Claim 1	Broadcom Symantec VIP
license stored on the remote computer, and	<div data-bbox="514 284 1885 332"> <div>Solution Overview</div> </div> <p>Symantec® VIP is a multifactor, risk-based authentication service that provides a secure and user-friendly way to protect mobile and web applications anytime, anywhere, from any device for your employees, customers, and partners, enabling a critical piece of your Zero Trust security strategy. VIP's cloud-based infrastructure delivers scalability and reliability to enable your organization to support millions of users.</p> <p>Looking for an on-premise authentication solution? Symantec Advanced Authentication can authenticate employees, customers, or partners while providing a frictionless login experience. This ensures that legitimate users have anytime, anywhere access from any device, which builds trust and brand loyalty.</p> <p>Looking for something in between? Symantec VIP Authentication Hub boasts a cloud-native architecture, allowing for deployment within minutes that delivers primary and secondary authentication and policy orchestration to control the authentication journey.</p> <p>(https://www.broadcom.com/products/identity/vip)</p>
wherein the mobile authentication device is associated with the software license stored on the remote computer;	<p>The mobile authentication device is associated with a software license to at least Symantec VIP stored on the remote computer.</p> <div data-bbox="514 885 1885 933"> <div>Solution Overview</div> </div> <p>Symantec® VIP is a multifactor, risk-based authentication service that provides a secure and user-friendly way to protect mobile and web applications anytime, anywhere, from any device for your employees, customers, and partners, enabling a critical piece of your Zero Trust security strategy. VIP's cloud-based infrastructure delivers scalability and reliability to enable your organization to support millions of users.</p> <p>Looking for an on-premise authentication solution? Symantec Advanced Authentication can authenticate employees, customers, or partners while providing a frictionless login experience. This ensures that legitimate users have anytime, anywhere access from any device, which builds trust and brand loyalty.</p> <p>Looking for something in between? Symantec VIP Authentication Hub boasts a cloud-native architecture, allowing for deployment within minutes that delivers primary and secondary authentication and policy orchestration to control the authentication journey.</p> <p>(https://www.broadcom.com/products/identity/vip)</p>

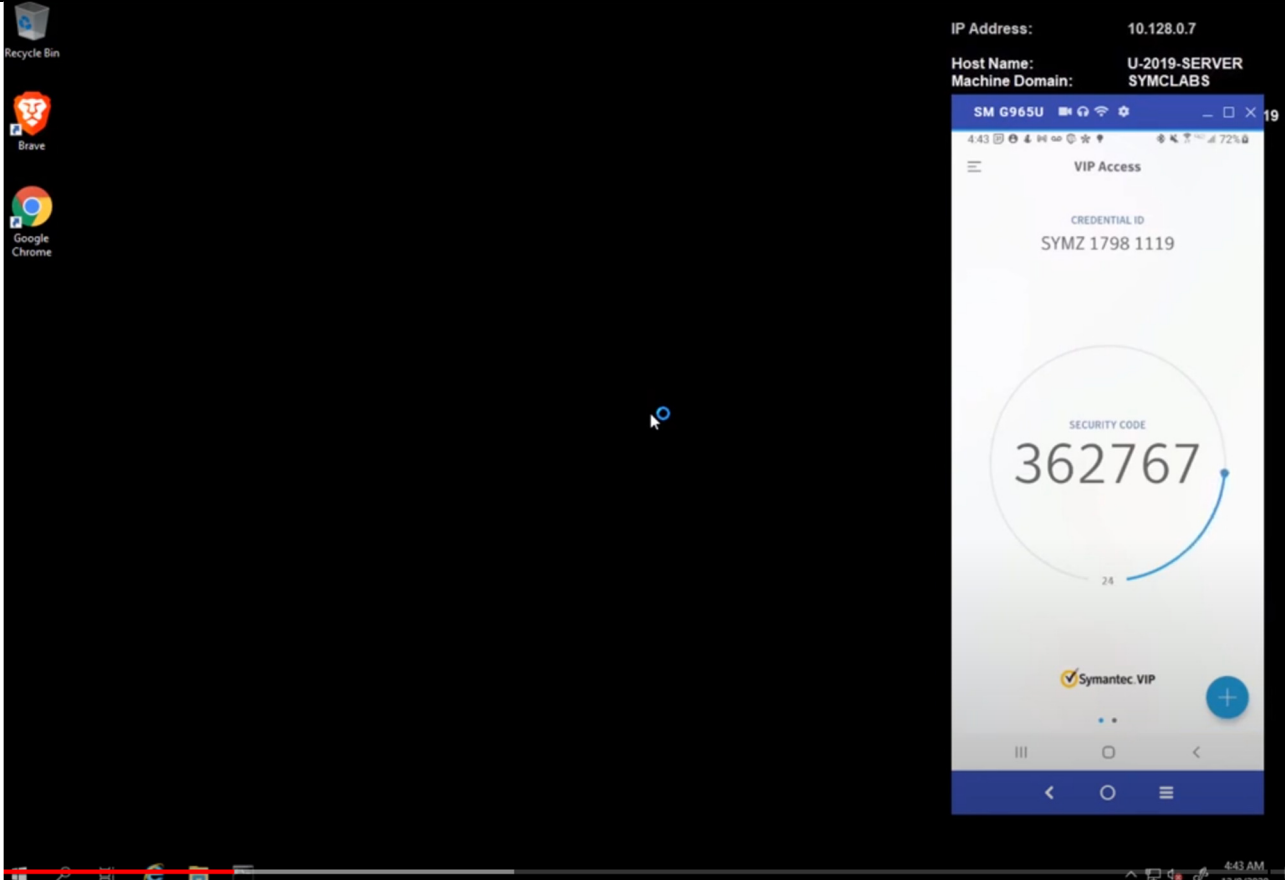
Claim 1	Broadcom Symantec VIP
<p>determining, by the remote computer, whether the user device unique identifier is valid in combination with the software license stored on the remote computer;</p>	<div data-bbox="520 282 812 323">Device Hygiene</div> <div data-bbox="520 337 1266 542"><p>VIP includes a device hygiene SDK that can be used inside of a mobile application to evaluate the device for malware, jailbreaking, and network risk. The SDK also lets your client deny access to compromised devices before they can attempt authentication to your network, and track advanced and persistent threats.</p></div> <div data-bbox="520 574 1115 607"><p>(https://docs.broadcom.com/doc/symantec-vip)</p></div> <div data-bbox="531 643 919 680">VIP Policy Configuration</div> <div data-bbox="531 703 1543 1182"></div> <div data-bbox="514 1200 1281 1232"><p>(https://www.youtube.com/watch?v=SdY13B5mExI (5:47))</p></div>

Claim 1	Broadcom Symantec VIP
<p>validating, by the remote computer, using the software identifier and the user device unique identifier, whether the software application stored on the user device is authorized for use on the user device;</p>	<h3 data-bbox="527 285 1083 326">Multifactor Authentication</h3> <p data-bbox="527 350 1388 1049">Being able to positively identify legitimate users from fraudulent ones is an important first step to achieving Zero Trust, and a critical step in designing a modern identity fabric. VIP enables enterprises to deliver secure access to corporate networks and applications from anywhere in the world, providing improved productivity and better insight. The service offers a multitude of user-friendly authentication options to protect against unauthorized access, including a broad range of second-factor options such as push, SMS or Voice OTP, mobile authenticators, FIDO2, and biometrics. VIP also offers a series of hardware-based authenticators, including cards, keys, and tokens that can be purchased separately. These options can be used for internal employees or partners. Finally, <u>the cloud-based service is also built to protect consumer-facing mobile and web applications</u>, resulting in increased customer confidence and reduced fraud costs.</p> <p data-bbox="516 1089 1115 1122">https://docs.broadcom.com/doc/symantec-vip</p>

Claim 1	Broadcom Symantec VIP
<p>upon validating, by the remote computer, that the software application is authorized for use on the user device, transmitting, by the remote computer to the user device, a validation message associated with the user device; and</p>	<div data-bbox="514 289 1425 1182"></div> <p data-bbox="514 1198 1283 1235">https://www.youtube.com/watch?v=SdY13B5mExI (2:35))</p>

Claim 1	Broadcom Symantec VIP
	<div data-bbox="514 261 1625 964"></div> <p data-bbox="514 982 1270 1019">https://www.youtube.com/watch?v=SdY13B5mExI (2:39)</p>

Claim 1	Broadcom Symantec VIP
<p>responsive to transmitting the validation message, transmitting, by the remote computer, data to the user device.</p>	 <p>(https://www.youtube.com/watch?v=SdY13B5mExI (2:45))</p>

Claim 1	Broadcom Symantec VIP
	<div data-bbox="512 261 1789 1136">A screenshot of a Windows desktop environment. On the left side, there is a vertical taskbar with icons for the Recycle Bin, Brave browser, and Google Chrome. The desktop background is dark. Overlaid on the right side of the desktop is a mobile application interface for Symantec VIP. The app shows system information at the top: IP Address: 10.128.0.7, Host Name: U-2019-SERVER, and Machine Domain: SYMCLABS. Below this, it displays 'VIP Access' with a 'CREDENTIAL ID' of 'SYMZ 1798 1119'. A large circular graphic in the center contains the 'SECURITY CODE' '362767'. At the bottom of the app interface, there is a 'Symantec VIP' logo and a blue circular button with a plus sign. The Windows taskbar at the very bottom shows the time as 4:43 AM.</div>
	<p data-bbox="512 1157 1283 1190">https://www.youtube.com/watch?v=SdY13B5mExI (2:54))</p>